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15 May 2012

**Mandatory population of new fields on the Registry  
PUBLIC VERSION**

1. Vector welcomes the opportunity to respond to the Electricity Authority's ("Authority") consultation paper entitled *Mandatory Population of New Fields in the Registry: Consultation Paper*, dated 17 April 2012. One part of this submission is confidential and we have provided a public and a confidential version.
2. Vector's contact person for this submission is:  
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General comments

3. The Authority has decided to create three new fields in the Registry to record:
  - a) The energisation date of each ICP initially energised on or after 6 June 2013;
  - b) Whether the distributor bills some, all or none of their line charges at each ICP; and

c) Where the distributor does directly bill lines charges, a description of the lines charges that are directly billed.

(a) and (b) are proposed to be mandatory fields for distributors to complete, while (c) is proposed to be optional.

4. The Authority is not consulting on whether to include these fields in the Registry – that decision has already been taken, but on whether it should be mandatory for distributors to complete the fields.
5. While the Authority’s decision not to consult on the creation of these new fields is not best practice, we recognise the reasons for the decision. Vector supports in principle the creation of the new fields.
6. The changes required by the Authority will require software changes to be made by industry participants. We estimate that this will cost approximately [ ] **VCI** for Vector and expect similar costs to be faced by other industry participants. To enable software changes to be made, Vector **recommends** the Authority provides for a transition period before the mandatory requirement to complete the fields takes effect.

#### Initial energisation date

7. Vector supports the proposal for a field to capture the initial energisation date and for the field to be mandatory. However, we note that it is not always the distributor’s responsibility to energise ICPs. On Vector’s Auckland network, it is the retailer that has the responsibility for ICP energisation. Vector **recommends** the requirement to complete the field should apply to the party that has responsibility for energising ICPs on each network.

#### Direct billed status

8. Vector supports the creation of the field and its mandatory status. However, Vector would have preferred the alternative option proposed (a simple “Y” or “N” option).<sup>1</sup> This would suffice as retailers should be aware of all consumers that distributors directly bill as retailers will not be dealing with lines charges for those customers.
9. Further, Vector does not consider that this proposed field will capture all necessary information. Vector submits that date fields are required to identify when direct billing starts or finishes as some customers change between being directly billed by distributors and paying lines charges through the retailer. Vector **recommends** the Authority considers whether it is able to make this additional change within the timeframes of the Part 10 implementation process.

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<sup>1</sup> Consultation paper, page 10.

Direct billed description

10. Vector supports the Authority's view that completion of this field should not be mandatory.

Yours sincerely,

A handwritten signature in blue ink that reads "B Girdwood". The signature is written in a cursive style with a small flourish at the end.

**Bruce Girdwood**  
Manager Regulatory Affairs